

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
FTX TRADING LTD., <i>et al.</i> , ¹)	Chapter 11
Debtors.)	Case No. 22-11068 (JTD)
)	(Jointly Administered)
)	Related to Docket No.

**ORDER GRANTING MOTION OF KARIYA KAYAMORI
AUTHORIZING THE FILING OF CERTAIN PLEADINGS UNDER SEAL**

Upon the motion (the “Motion to Seal”)² of Kariya Kayamori (“Kayamori”) for entry of an order (this “Order”) pursuant to section 107(c) of the Bankruptcy Code, Bankruptcy Rule 9018, and Local Rule 9018-1(b) authorizing Kayamori to file under seal (i) the *Response to Debtors’ Objection to Proof of Claim Filed by Kariya Kayamori* [D.I. 23335]; (ii) the *Declaration of Kariya Kayamori* [D.I. 23342] (the “Kayamori Decl.”); (iii) the *Declaration of Former Chief Judge Kaiami* [D.I. 23340] (the “Kaiami Decl.”); (iv) the *Declaration of Nathaniel Reisenburg* [D.I. 23339] (the “Reisenburg Decl.”); (v) the *Declaration of Hiroki Sugita* [D.I. 23336] (the “Sugita Decl.”); and (vi) the exhibits attached to each of the foregoing (collectively, the “Scaled Pleadings”); and the Court having found that it has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and the Court having found that venue of this proceeding and the Motion to Seal in this district is proper

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion to Seal.

pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that the relief requested in the Motion to Seal is in the best interests of the Debtors' estates, their creditors, and other parties in interest; and the Court having found that Kayamori provided appropriate notice of the Motion to Seal and the opportunity for a hearing on the Motion to Seal under the circumstances; and the Court having reviewed the Motion to Seal and having heard the statements in support of the relief requested therein at a hearing, if any, before the Court (the "Hearing"); and the Court having determined that the legal and factual bases set forth in the Motion to Seal and at the Hearing establish just cause for the relief granted herein; and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Motion to Seal is granted as set forth in this Order.
2. Kayamori is authorized to file the Sealed Pleadings under seal, which shall remain under seal and confidential and shall not be made available to anyone without the written consent of the Debtors and Kayamori or by further order of this Court.
3. Notice of the Motion to Seal as provided therein shall be deemed good and sufficient and the requirements of the Local Rules are satisfied by such notice.
4. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.
5. Kayamori is authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion to Seal.
6. This Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.